Palladium
MAKE IT POSSIBLE

Due diligence form

Please provide answers to and information regarding all of the questions below. For any answer requiring more space than is given in this form, please attach the complete answer on a separate sheet. To the extent permitted by law, all information provided in this form will be held in confidence and not disclosed to any third parties without prior notice and approval.

Part 1 Identifying information

Part 1 a

To be completed if an **organisation** is the subject of Due Diligence

Name of organisation:	...
Organisation headquarters address/main office:	…
Country or countries where activities will take place:	…
Website for organisation:	…
Name of owner/managing director for organisation:	…
List any former name(s) owner/managing director for organisation:	…

Part 1 b

To be completed either if an **individual** is the Subject of Due Diligence or, if an **organisation** is the Subject of Due Diligence, then to be filled out by the owner/managing director of the organisation

Full Legal Name (As written on passport or national identification card)		…	
Home address for individual or owner/managing director, phone number, and email address:		…	
Identify card / Passport:		…	
Nationality:	…	Date of birth:	dd/mm/yyyy
Telephone:	…	E-mail:	…

Part 2 Business information

(Only applicable if an organisation is the Subject of Due Diligence. For individual move to part 4)

To be completed by the owner/managing director

a	Sole Proprietorship ☐	Partnership ☐	Corporation ☐	Non Profit ☐	Other ☐
	If other, please specify below: …				
b	Is this organisation registered? If so, please note the country and registration number below …		☐ Yes		☐ No
d	Is the entity an organisation listed on a public stock exchange? If so, please provide relevant details below. …		☐ Yes		☐ No
e	If applicable, please list any parent companies or subsidiaries below: …				

Does any Public Official or government entity have any financial, management or controlling interest in your organisation? If so, provide details and level of interest below. …	☐ Yes	☐ No

Please list the full names and date of birth of all Principals for your organisation. (Note: the term "Principal" includes, but is not limited to, the executive officers, partners, owners, directors, trustees or others who exercise control over your organisation).

…

Part 3 Compliance, health and safety

Does the organisation have an institutionalized Financial and internal controls policy? If so, please attach or provide details below.	☐	Yes	☐	No

…

Does the organisation have an occupational health and safety (OHS) policy? If so, please attach or provide details below.	☐	Yes	☐	No

…

Please state whether the organisation meets the legislative requirement of compulsory insurance where business will take place and please attach the certification or provide details by country or countries.

…

Part 4 Government relationships

To be completed by the individual or owner/managing director of the organisation

Please state whether:	You are a current Public Official (as that term is defined in Part 7 below)	Yes	☐	No	☐
	Your organisation employs a current Public Official *(If applicable)*	Yes	☐	No	☐
	You are a close relative (i.e. mother, father, sister, brother, spouse or child) of a Public Official	Yes	☐	No	☐
	Any Principal of your organisation has a close relative who is a Public Official *(If applicable)*	Yes	☐	No	☐

For any person identified as a close relative above, please provide their name (surnames and given name), title, relationship to you or the organisation, and responsibilities for the government, agency, or government controlled enterprise or company. If additional space is needed, attach a separate sheet of paper.

…

Part 5 Prior conduct

To be completed by the individual or owner/managing director of the organisation

Have you (or any Principals of your organisation) ever been investigated for, charged with, convicted or otherwise implicated in criminal, corrupt, unethical, or unlawful conduct?	Yes	☐	No	☐
(If applicable) Has the organisation, or any subsidiary or affiliate of your organisation ever been investigated for, charged with, convicted or otherwise implicated in criminal, corrupt, unethical, or unlawful conduct?	Yes	☐	No	☐
(If applicable) Has the organisation ever been issued a sanction or committed a violation of law or regulation?	Yes	☐	No	☐

If yes to any of the above, please describe the circumstances below:

…

Part 6 Additional disclosures

To be completed by the individual or owner/managing director of the organisation

Please provide any additional information below that would assist the company in performing its due diligence review. If more space is needed, attach a separate sheet.

…

Part 7 Certification

To be completed by the individual or owner/managing director of the organisation

Certification
I hereby certify that:

To the best of my knowledge, all information in this response is truthful, correct and complete;
I have read the information at the websites noted below and I am familiar with the requirements of these anticorruption statutes:

UK Bribery Act 2010;

Australian Criminal Code;

U.S. Foreign Corrupt Practices Act;

I have read the definition of Public Official below and declare that neither I, nor any of my immediate family members, are Public Officials, except as previously disclosed.

I have never paid, approved for payment or otherwise provided, directly or indirectly, anything of value to a Public Official for any improper, corrupt or illegal purpose, nor will I; and I have never created a false invoice or otherwise manipulated documentation to disguise making a payment or otherwise providing anything of value to a Public Official for any purpose, nor will I.

NOTE: “Public Official” means any person, whether elected or appointed who holds an executive, legislative, administrative or judicial office or position in any public entity, including any international agency. In addition, “Public Official” includes any person who performs public functions in any branch of the national, state, local or municipal government of any country or territory or who exercises a public function, by employment or under contract, for any public entity, agency or enterprise of such country or territory, including state owned or controlled enterprises. The definition of “Public Official” also includes any official of a political party or any candidate for political office.

I further hereby acknowledge that I have reviewed the Business Partner Code of Conduct and I, and/or my organisation, will comply with all requirements set out in such Code.

Data Collection Notice
If you are completing this form for yourself as an individual, then you acknowledge the following. If you are completing this form for an organisation (whether a company, trust, charity or similar), you acknowledge that you have obtained consent to the following from the relevant individuals.

Palladium is committed to the protection of personal information and compliance with relevant data protection and privacy laws. The information requested by this form is collected directly from you to assess your suitability, or that of a relevant individual, to provide services to Palladium, its clients and/or any of its projects. The information we will collect pursuant to this due diligence exercise is as outlined in this form, but we may also obtain information through an investigative report, which may draw on public registers, interviews or public media. We collect this information on the legal basis of your consent, and then will later use it for the performance of any contract with you or for the performance of any relevant contract with our clients.

This information may be shared with any of Palladium's related companies or relevant clients where such sharing is a) required by a relevant law, our contract with you or with our clients; or b) permitted by a relevant data protection law. Where sharing is with related companies, such related companies will comply with Palladium data protection guidelines.

This information may be provided to our offices/related companies overseas, subject to such overseas offices/related companies being bound by the same data protection standards as the office or company to which you provide the information and provided also that such transfer of information is required as part of fulfilling the purpose of or reasons for the provision of the information, or for the performance of any subsequent contract. An example of this might be that the relevant decision maker or individual involved in the decision is based in another location. Further details are available at http://thepalladiumgroup.com/legal/our-policies.

The information you provide will be used to a) make an informed assessment about whether Palladium can enter into an agreement with you or your organisation, b) manage your contract and services with Palladium in the event we enter into an agreement with you, or c) assess certain internal diversity and inclusion metrics. If you do not provide your data or consent to processing by us then we cannot assess your suitability to enter into a contract with you.

Depending on your country of residence, you may have certain data protection or privacy rights. You can find details, including our retention guidelines, at http://thepalladiumgroup.com/legal/our-policies. Privacy or data protection queries can be directed to Privacy@thepalladiumgroup.com

Signature:

Name: …

Title: …

Date: …